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June 15, 2023

VIA ECF

Honorable Sarah Netburn
United States District Court
Southern District of New York
Thurgood Marshall Courthouse
40 Foley Square, Room 430
New York, New York 10007

**Re: In Re Terrorist Attacks of September 11, 2001, 03 MDL 1570
Gaston v. The Islamic Republic of Iran, No. 18-cv-12337**

Dear Judge Netburn:

We write in response to the Court’s Order of June 15, 2023 (ECF 9128) seeking clarification regarding the motion for default judgment filed on behalf of the Estate of Betsy Martinez (the “Estate”). The Court correctly noted that the exhibits to Plaintiffs’ motion for default judgment requested an award of \$8,500,000.00 for the Estate. This request was the result of an inadvertent error on the part of counsel. The Estate of Betsy Martinez seeks an award of \$2,000,000.00 which is consistent with the Court’s previous awards for estates of individuals killed in the 9/11 Attacks.

We can also confirm that the Estate has not previously received any awards for compensatory damages in this case. Prior to filing the motion for default judgment, my colleague, Austin Estelle, confirmed with members of the Executive Committee that no prior judgments had been awarded to the Estate. Our office also independently reviewed the Court’s docket, including the main MDL docket, and did not identify any previous judgments entered on behalf of the Estate.

We apologize for our error and any inconvenience that this may have caused the Court in its review of Plaintiffs’ motion for default judgment. If the Court should need any additional information, or would require the filing of an amended motion, please contact the undersigned.

Respectfully,

THE MILLER FIRM LLC



David J. Dickens